

Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STRIKE 3 HOLDINGS, LLC, a Delaware
corporation,

Plaintiff,

v.

JOHN DOE, subscriber assigned IP address
73.225.38.130,

Defendant.

Case No.: 2:17-cv-01731-TSZ

**DECLARATION OF LINCOLN
BANDLOW IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PROTECTIVE ORDER TO VACATE,
POSTPONE, AND/OR LIMIT
DEPOSITION OF GREG LANSKY**

I, Lincoln Bandlow, declare as follows:

1. I am over the age of 18 and am otherwise competent to make this declaration. I am one of the attorneys representing Plaintiff Strike 3 Holdings, LLC ("Strike 3") in the above-captioned matter. I am admitted to practice law in all of the courts of the State of California and I have obtained leave to appear *pro hac vice* (Dkt. # 16) in this matter on behalf of Strike 3.

2. I offer this declaration in support of Strike 3's Motion for a Protective Order ("Motion"). This declaration is based on my personal knowledge and, if called upon to do so, I could and would testify that the facts stated herein are true and accurate.

3. Attached as **Exhibit A** is a true and correct copy of a deposition notice for Mr. Greg Lansky that Defendant's counsel, Mr. J. Curtis Edmonson, sent to me by email on December 30,

BANDLOW DECLARATION IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER (2:17-CV-01731-TSZ) - 1

Fox ROTHSCHILD LLP
1001 FOURTH AVENUE, SUITE 4500
SEATTLE, WA 98154
206.624.3600

1 2018. The notice indicates Defendant seeks to depose Mr. Lansky on January 31, 2019. Mr.
2 Edmonson did not consult with me before unilaterally picking that date. After receiving the
3 deposition notice, I informed Mr. Edmonson that I was not available on January 31, 2019 for Mr.
4 Lansky's deposition and that it would need to be scheduled to a different date. On January 23, 2019,
5 Mr. Edmonson sent an email proposing different dates in February and March of 2019 to depose Mr.
6 Lansky. Attached as **Exhibit B** is a true and correct copy of that email.

7 4. To date, Defendant has not sought to depose Strike 3 pursuant to Fed.R.Civ.P.
8 30(b)(6) or served a deposition notice on Strike 3 to that effect.

9
10 I declare under penalty of perjury under the laws of the State of Washington and the United
11 States of America that the foregoing is, to the best of my knowledge, true and correct.

12 DATED this 7th day of February, 2019, in Sacramento, California.

13
14 

15
16
17
18
19
20
21
22
23
24
25
26

Lincoln Bandlow


CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will notify the following persons of such filing:

J. Curtis Edmondson, WSBA #43795
3699 NW John Olsen Place
Hillsboro, OR 97124
Telephone: (503) 336-3749
Email: jcedmondson@edmolaw.com

☒ Via CM/ECF
☐ Via U.S. Mail
☐ Via Messenger Delivery
☐ Via Overnight Courier
☐ Via Facsimile

DATED this 7th day of February, 2019.



Courtney R. Tracy
Legal Administrative Assistant